

TODD

PACIFIC SHIPYARDS CORPORATION

Seattle Division: P.O. Box 3806, Seattle, Washington 98124 Telephone (206) 623-1635

March 18, 1987

Lori Cohen
United States Environmental Protection Agency
Superfund Branch
1200 Sixth Avenue
HW-113
Seattle, Washington 98101

SEP 23 1987

Re: Harbor Island Superfund Site

Superfund Branch

Dear Ms. Cohen:

I have enclosed our responses to your latest CERCLA 104 request. As we discussed previously, the scope of your request makes complete answers impossible. We have however assembled the information available excepting question #7. Discovery continues as to this insurance issue.

Very truly yours,

TODD PACIFIC SHIPYARDS CORPORATION
Seattle Division



Michael G. Marsh
Attorney

MGM:lbt



RESPONSE TO EPA INQUIRY DATED 08-05-87

1. Additional information of Todd-owned/leased facilities.

1.1 Todd Shipyard (currently defined boudaries)

Purchased 5.4 acres in June 1918; 9.4 acres in February 1942; 5.3 acres in June 1968; 7 acres in December 1969. Todd has operated continuously at this site since June 1918. The yard was initially operated as a repair facility only, and did not start building ships until 1952 when the shipbuilding ways were constructed. From 1918 to 1952 the yard was repair-oriented and accomplished activities ranging from steel/hull repair, machining, blasting and painting. There are no defined process flows for this type of activity. When a ship arrived for repairs it could be of a minor nature to a major overhaul involving all systems on board the vessel. Major changes in operation have been few. With the addition of the shipbuilding ways in 1952, Todd could now accomplish all facets of shipbuilding. A welding panel line was installed along with large transport capabilities. Todd erected a recyclable steel shot blasting and coating facility in 1983 and discontinued using copper slag for part and section blasting. Tax # H 766670 - 2850-36
H 766670 - 2850-02

1.2 Lease Texaco Property - Undeveloped land (13,000 sq.ft.)

South of the Southeast property corner. Area was leased from 1978 to 1985 and was used for new paint storage and waste paint storage during 1985 only. Approximately 10,000 to 40,000 gallons of new paint was stored and disbursed. Approximately 4,000 gallons of waste paint was stored and processed through this area.

1.3 Leased Shalmar Group Property -

Leased 1500 sq.ft. of office space during 1985. Area was occupied by U.S. Government. No shipyard processes were conducted at this site.

1.4 Leased Port of Seattle property - Former Crowley Building

Terminal 17. Building was leased from 1977 to 1985 and was occupied by the U.S. Navy and used as offices only. No shipyard processes were conducted at this site.

1.5 Leased Port of Seattle property - Terminal 20

Warehouse and open storage. This site was used to store U.S. Navy furnished shipboard material. Alodine 1201, an aluminum etching material, was stored at this site from 1981 to 1985. Drum storage only. Material was not used at this site. MSDS provided at earlier request.

1.6 Leased Arco Property - Warehouse and open storage.

Site used to store fabricated pipe. Pipe was fabricated in Todd's pipe shop and stored at Arco until installed on FFGs under construction. No hazardous materials were used or stored at this site.

1.7 Leased Fisher property - undeveloped land used to store steel components ranging from cranes to racks. No hazardous materials were used or stored at this site.

2. Hazardous materials associated with operation.

See attachment.

* History of paint usage.

* 10-year history of Todd paint usage.

3. The office building adjacent to Pier 17, the former Crowley Building, listed as response 1.7, was leased by Todd from the Port of Seattle.
4. Historical information on hazardous material storage is completely lacking prior to the 1960's. Paint materials have always been stored in upright racks. The paint storage was moved to the leased Texaco property in 1978. An impervious surface with bermed perimeter and cover was installed at the Texaco site in 1983. The paint storage and hazardous waste storage was relocated to an area in the shipyard in 1984. The area is bermed, fenced, and covered, and has been the subject of past RCRA inspections. Other hazardous materials have been routinely stored in our "Stores" building T-58, and warehouse Building T-149.
5. There are no records on hazardous waste generation prior to enactment of RCRA in 1976. Only available generation reports are from the years 1984 forward. Copies are attached.
6. PCB Equipment - Todd has had no PCB equipment in the yard since 1984.
Transformers - PCB

Todd Log#	Manufact.	Amount	S/N	Concentration	Date/Place Disposed
1	Westinghouse	40 gal.	3260516	PPM	2/80 Arlington Oregon
2	"	40 gal.	3260514	630,000	1/84 "
3	"	40 gal.	3260515	620,000	1/84 "
4	"	57 gal.	3260512	610,000	" "
7	"	57 gal.	3260511	480,000	11/82 Alabama Oregon
8	"	57 gal.	3260507	620,000	" "
9	"	57 gal.	3260506	620,000	" "
10	"	57 gal.	3260509	610,000	" "
12	"	57 gal.	3260508	610,000	11/82 Arlington Oregon
13	"	52 gal.	3261507	450,000	1/84 "
14	"	52 gal.	3261508	450,000	" "
15	"	52 gal.	3261506	580,000	11/82 "
17	"	19 gal.	1745669	1,100	2/80 "
20	General Elec.	50 gal.	6457009	220 PPM	11/82 Alabama Oregon
29	"	40 gal.	7692132	450,000	1/84 Oregon
30	"	40 gal.	7692133	480,000	1/84 "
31	"	100 gal.	9353183	15,000	1/84 "
32	Westinghouse	40 gal.	3260510	610,000	11/82 Alabama/Oregon
1095#	Fluorescent light ballasts			720,000	1/84 Oregon
150#	Capacitor and Starter			7,500.00	" "

The equipment listed above was replaced with dry type transformers.
 To our knowledge there has never been a PCB spill at Todd's facility.

7. Insurance - See Mike Marsh
8. There has been three environmental investigations at Todd/Seattle. During the construction of the side launch building ways in 1970, oil was discovered floating on top of the ground water and at a depth of approximately 10 feet. A well was installed to recover the oil. This well was in operation for approximately three years with a total oil recovery of approximately 1000 gallons. The well location was in the northwest part of the shipyard. The second investigation was related to oil products floating on the ground water and was discovered while installing an electrical vault in the vicinity of Building T-114. EPA investigated and filed a report, of which Todd has no copy. Attached is a copy of the analysis of the oil. No attempt was made to recover any of the product. EPA said to do nothing. This occurred in August 1980. The third investigation concerned the removal of a leaky underground gasoline storage tank. D.O.E. was notified and investigated the site. Attached is the letter from DOE on what steps to take, along with copies of the sampling and well monitoring reports.
9. Storm Drains

Todd Shipyards cleans the sump of all catch basins twice a year. The material is mixed with our waste sandblast grit and subsequently transported to Ideal Basic Cement to be incorporated into their cement products. The transporter is Western Services, 690 Visser Road, Lynden, WA 98264.

10. Sandblast grit is purchased from Klean Blast of Tacoma. Grit was disposed of at Sunset Landfill from the late 1960's to 1985. Since 1985 the grit has been transported to Ideal Basic Cement for incorporation with cement products.